

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**TERRY CARTER, JENNIFER
KRUEGER, AND LISBETT
RODRIGUEZ**

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Judge Leinenweber

JURY TRIAL DEMANDED

REPORT OF PARTIES' PLANNING MEETINGS

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Plaintiffs Terry Carter, Jennifer Krueger, and Lisbett Rodriguez, by and through their attorneys, Stowell & Friedman, Ltd., and Defendant Transit Television Network LLC by its attorneys Michael W. Duffee and Becky L. Kalas of Ford & Harrison LLP submit the following planning report:

1. Pursuant to Fed. R. Civ. P. 26(f), the parties have engaged in planning meetings, both telephonically and in person, beginning in December 2007. Specifically, the parties met on December 27, 2007 at defense counsel's offices, and revisited the issues telephonically on January 24, 2008. Participating in these scheduling discussions for Plaintiffs were Ethan Zelizer and/or Jasmine Simmons of Stowell and Friedman, Ltd., and participating for Defendant was Michael Duffee and/or Becky L. Kalas of Ford and Harrison, LLP.

2. Pre-Discovery Disclosures. Plaintiffs propose that the parties exchange information required by Fed. R. Civ. P. 26(a)(1) on or before February 15, 2008.

3. Discovery Plan. Plaintiffs propose to the court the following discovery plan:

A. Discovery will be necessary on the following subjects:

- (i) The facts and circumstances surrounding Defendant's office closures.
- (ii) The facts and circumstances surrounding termination of Plaintiff Carter's employment.
- (iii) The facts and circumstances regarding Plaintiff Carter's Title VII and Section 1981 claims, including alleged complaints about racial and gender discrimination.
- (iv) The facts and circumstances regarding Defendant's defenses and affirmative defenses to Plaintiff Carter's Title VII and Section 1981 claims.
- (iv) The facts and circumstances regarding Plaintiffs' Equal Pay Act claims, including comparable employees to all Plaintiffs for purposes of assessing their equal pay claims.
- (v) The facts and circumstances regarding Defendant's defenses and affirmative defenses to Plaintiffs' Equal Pay Act claims.
- (vi) Information relevant to all Plaintiffs' potential damages and efforts to mitigate damages.

B. Written Discovery. Written discovery is to be served in time to be completed by May 15, 2008.

C. Depositions. Plaintiffs propose that each party take a maximum of ten (10) depositions, with 7-hour limitations on each deposition unless extended by agreement of the parties or court order. Defendants propose that each party take a maximum of five (5) depositions. Depositions are to be completed by June 16, 2008.

D. Experts. The parties have not determined at this time whether they will need expert testimony in this case.

E. Supplementation of Disclosures. Supplementation of disclosures and responses, if deemed necessary under Rule 26(e), should be due not later than July 15, 2008.

4. Other Items

A. Pursuant to the Court's January 30, 2008 Order, the parties will meet with Judge Leinenweber for a settlement conference on February 26, 2008 at 2:00 p.m. As orally instructed by Judge Leinenweber, the parties will engage in informal exchange of discovery prior to that date.

B. At this time, Plaintiffs do not anticipate joinder of any additional parties or amendment of the pleadings as they now stand.

C. The parties propose that all dispositive motions be filed by July 30, 2008.

D. Confidential information, including but not limited to documents and information regarding current or former employees of Defendant and Defendant's financial and business planning information, if relevant, will be provided or produced pursuant to a mutually agreed confidentiality agreement or protective order.

Respectfully submitted,

/s/ Ethan G. Zelizer
Attorney for Plaintiffs
Ethan G. Zelizer
IL ARDC # 6280096

Linda D. Friedman
Ethan G. Zelizer
Jasmine E. Simmons
STOWELL & FRIEDMAN, LTD.
321 S. Plymouth Court
Suite 1400
Chicago, Illinois 60604
(312) 431-0888

s/ Becky L. Kalas
Attorney for Defendant
Becky L. Kalas
IL ARDC # 6279983

Michael W. Duffee
Becky L. Kalas
FORD & HARRISON LLP
55 E. Monroe Street
Suite 2900
Chicago, Illinois 60603
(312) 332-0777 (phone)
(312) 332-6130 (fax)